

**U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Robert Charles Ash

Debtors.

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Case No.: 19-17781-amc
Chapter 13

NOTICE OF MOTION

Sirs:

Please Take Notice that upon the annexed application of Shamika Stephenson, debtor herein, the undersigned will move before Honorable Ashely M Chan, Bankruptcy Judge, at United States Bankruptcy Court, Eastern District of Pennsylvania, 900 Market Street, Philadelphia, Pennsylvania as soon as counsel may be heard, for an order pursuant to Bankruptcy Rule 1007(c) extending the time of the debtor herein to file the Chapter 13 Plan and Schedules to January 24, 2020, and for such other relief as is just.

Dated: January 14, 2020

/s/ George R Tadross

George R Tadross, Esquire
128 Chestnut Street, Suite 204
Philadelphia, PA 19106
215-500-5000 (phone)
267-885-2377 (fax)
Attorney for Debtor

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MOTION FOR EXTENSION OF TIME

To the Honorable Ashely, Bankruptcy Judge:

The application of Robert Charles Ash, by George R Tadross, Esquire,
applicant's attorney, respectfully represents:

- (1) A voluntary petition pursuant to section 301 of Title 11, United States Code, was filed herein on December 13, 2019.
- (2) That the automatic fifteen day extension of time to file the plan as provided for in Bankruptcy Rule 1007(c) expires on January 10, 2020.
- (4) That applicant is unable to prepare and file schedules and plan within the time fixed in said order and requires additional time to do so for the following reasons:

(5) The applicant and his attorney are still in the process of gathering all of the required information because of the complex nature of this particular case.

Wherefore, the applicant move for the annexed order extending the time for filing schedules, statement of financial affairs, and plan herein until January 24, 2020, for which relief no previous application has been made.

Dated: January 14, 2020

/s/ George R Tadross _____

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ORDER

The debtor having moved for an extension of time to file the schedules, statement of affairs and plan as required by Bankruptcy Rule 1007(b),

Now, upon the application of the debtor dated January 14, 2020, and cause having been shown therefore,

It is hereby ordered that the time of the debtor herein to file the schedules, and plan required by Bankruptcy Rule 1007(b) is extended for an additional 15 days until January 24, 2020.

DATED:

UNITED STATES BANKRUPTCY JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following: William C Miller ecfmail@ph13trustee.com, and United States Trustee at USTPRegion03.PH.ECF@usdoj.gov.

DATED: January 14, 2020

/s/ George R Tadross

George R Tadross, Esquire
128 Chestnut Street, Suite 204
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215-500-5000 (phone)
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Attorney for Debtor